ROUTING AND TRANSMITTAL SLIP TO: (Name, office symbol, room number, building, Agency/Post) Initials Date -Leininger US EPA RECORDS CENTER REGION 5 Note and Return File Action Per Conversation Approval-For Clearance Prepare Reply As Requested For Correction For Your Information See Me Circulate Signature Investigate Comment Coordination Justify REMARKS Bob, Here are the Oak Village Associates necommend DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions Room No .- Bldg. FROM: (Name, org. symbol, Agency/Post) Phone No.

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LINDQUIST & VENNUM

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February 13, 1984

ROBERT G. MITCHELI J. MICHAEL DADY J. KEVIN COSTLEY ROBERT J. HARTMAN JOSEPH G. KOHLER PAUL H. TIETZ MARY E. CURTIN RICHARD D. MENEIL DONALD C. SWENSON ALAN C. PAGE JAMES P. MCCARTHY STEVEN J. JOHNSON RICHARD INDIG LYNN M. ANDERSON DAVID A. ORENSTEIN THOMAS E. GLENNON JOHN R. HOUSTON DENNIS M. O'MALLEY DANIEL J. SHERAN KEVIN H. ROCHE DAVID A. ALLGEYER N. ROLF ENGH RICHARD T. OSTLUND DEBORAH M. REGAN MARTIN R. ROSENBAUM ELINOR C. ROSENSTEIN DEBRA K. PAGE

OF COUNSEL
THOMAS VENNUM

Francis X. Hermann, Esq. Assistant U.S. Attorney 234 U.S. Courthouse Minneapolis, MN 55401

David Hird, Esq.
Room 1260
Environmental Enforcement
Land & Natural Resources
U.S. Department of Justice
Washington, D.C. 20530

Re: United States of America, et al. v. Reilly Tar & Chemical Corporation, et al.

Gentlemen:

Enclosed and served upon you please find Interrogatories to Plaintiff United States of America in connection with the above-entitled matter.

Sincerely yours,

LINDQUIST & VENNUM

Laurance R. Waldoch

LRW:dw Enclosure

cc: All Counsel of Record

w/enc.

90-1-1-21

UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA FOURTH DIVISION

United States of America,

Plaintiff,

Civil No. 4-80-469

and

State of Minnesota, by its Attorney General Warren Spannaus, its Department of Health, and its Pollution Control Agency, INTERROGATORIES TO PLAINTIFF UNITED STATES OF AMERICA

Plaintiff-Intervenor,

vs.

Reilly Tar & Chemical Corporation; Housing and Redevelopment Authority of St. Louis Park; Oak Park Village Associates; Rustic Oaks Condominium, Inc.; and Philip's Investment Co.,

Defendants.

and

City of St. Louis Park,

Plaintiff-Intervenor,

vs.

Reilly Tar & Chemical Corporation,

Defendant,

and

City of Hopkins,

Plaintiff-Intervenor,

vs.

Reilly Tar & Chemical Corporation,

Defendant.

TO: PLAINTIFF UNITED STATES OF AMERICA AND ITS ATTORNEYS FRANCIS X. HERMAN, 234 U.S COURTHOUSE, MINNEAPOLIS, MINNESOTA and DAVID HIRD, U.S. DEPARTMENT OF JUSTICE, WASHINGTON, DC 20530.

Please answer the following Interrogatories pursuant to the Federal Rules of Civil Procedure. These Interrogatories are deemed to be continuing and prompt updating is required by the rules.

- 1. If you intend to request relief or propose any solution to the subject contamination problem which involves any use, alteration or destruction of Oak Park Village Associate's property, describe fully how the request or proposal would affect the Oak Park Village Associate's site and property.
- 2. Identify all studies and proposals describing the proposed use, alteration or destruction and provide copies with your Answers to these Interrogatories. Please note, defendant is only interested in studies or proposals which potentially involve the Oak Park Village Associate's property.
- 3. If you intend to request relief or propose any solution to the subject contamination problem which will interfere with public access to the Oak Park Village Associate's site or property, describe fully how the request or proposal would affect the Oak Park Village Associate's site and property.
- 4. Identify all studies and proposals describing the proposed interference and provide copies with your Answers to Interrogatories.

5. These interrogatories are to be considered as on-going interrogatories which should be up-dated as information becomes available.

Dated: 3/13/84

LINDQUIST & VENNUM

By Lamons R Waldard

Laurance R. Waldoch
ATTORNEYS FOR OAK PARK
VILLAGE ASSOCIATES
4200 IDS Center

Minneapolis, Minnesota 55402 (612) 371-3211